

EXHIBIT B-4

Analysis of SRD Cash Flows**Exhibit B-4****Ecuador Litigation Related Vendor Expenditures and SRD Expenditures That May Be Ecuador Litigation Related (Sorted by Declining Total)**

Time Period: January 2010 through December 2018

Payee	Role/Relationship [1]	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Ecuador Litigation Expenditures											
Selva Viva	Case Administration	\$ (320,000)	\$ (130,000)	\$ (30,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (480,000)
Friedman Kaplan Seiler & Adelman	Donziger 1782 Counsel	(446,526)	-	-	-	-	-	-	-	-	(446,526)
Emery Celli Brinckerhoff & Abady	LAP Legal Representation for 1782s	(395,973)	-	-	-	-	-	-	-	-	(395,973)
Aaron Marr Page / Forum Nobis [2]	LAP Legal Team	(12,721)	-	-	(37,500)	(22,500)	(3,500)	(12,500)	(20,000)	(33,750)	(142,471)
Karen Hinton/Hinton Communications	Media/PR	(88,283)	(30,000)	-	-	(942)	-	(1,007)	-	(4,486)	(124,717)
Stratus Consulting	Environmental Consultants	(108,567)	-	-	-	-	-	-	-	-	(108,567)
PR Newswire	Media/PR	-	(53,480)	(41,499)	-	-	-	-	-	-	(94,979)
Pablo Estenio Fajardo Mendoza	LAP Ecuadorian Counsel	(14,000)	(50,000)	(15,000)	-	-	-	-	-	-	(79,000)
The Weinberg Group	Environmental Consultants	(50,000)	-	-	(25,000)	-	-	-	-	-	(75,000)
Jay Horowitz	LAP Legal Representation for 1782s	(65,813)	-	-	-	-	-	-	-	-	(65,813)
CSR Wire	Media/PR	-	(3,115)	(13,635)	(14,550)	(24,235)	(1,550)	-	-	-	(57,085)
Frente De Defensa De La Amazonia	FDA	-	-	-	-	-	-	(10,000)	(16,500)	(24,920)	(51,420)
Kerry Kennedy	Activist	(50,000)	-	-	-	-	-	-	-	-	(50,000)
Shuyana Natalia Yanza Allauca	Luis Yanza's Daughter	-	-	-	-	-	(2,000)	(19,500)	(9,100)	(3,000)	(33,600)
Fundacion Naupa de Saberes Andinos	NGO	-	-	-	-	-	-	-	(5,500)	(22,287)	(27,787)
3BL Media LLC	Media/PR	-	-	-	-	-	-	(4,600)	(11,705)	(10,100)	(26,405)
Amazon Watch	NGO and Media/PR	(5,000)	-	-	(10,000)	(10,000)	-	-	-	-	(25,000)
Brownstein Hyatt Farber Schreck	LAP Legal Representation for 1782s	(25,000)	-	-	-	-	-	-	-	-	(25,000)
Constantine Cannon LLP	LAP Legal Representation for 1782s	(25,000)	-	-	-	-	-	-	-	-	(25,000)
Fine and Associates	Investigations	(25,000)	-	-	-	-	-	-	-	-	(25,000)
Counsel Press	Professional Services - Legal	-	-	-	-	(24,250)	-	-	-	-	(24,250)
Maria Cristina Cadena Ponce	LAP Legal Team	(20,000)	(2,000)	-	-	-	-	-	-	-	(22,000)
Recht & Kornfeld	LAP Legal Representation for 1782s	(20,000)	-	-	-	-	-	-	-	-	(20,000)
Coffield Law Group LLC	1782 Counsel for A. Wray	(19,410)	-	-	-	-	-	-	-	-	(19,410)
Luis Yanza Angamarca	FDA	(10,000)	-	-	-	-	(5,800)	(1,000)	-	-	(16,800)
Outpost Digital	Media/PR	(15,000)	-	-	-	-	-	-	-	-	(15,000)
Pablo Guayasamin	Other Services	-	-	(15,000)	-	-	-	-	-	-	(15,000)
Julio Marcelo Prieto Mendez	LAP Ecuadorian Counsel	(10,000)	(2,000)	-	-	-	-	-	-	-	(12,000)
Long Tuminello Llp	Professional Services - Legal	-	-	-	-	-	-	(10,000)	-	-	(10,000)
Louis F Dematteis	Photographer	(410)	(7,500)	(418)	-	(309)	-	-	(605)	-	(9,242)
Becker Gallagher	Legal Publishing	-	-	-	-	-	(1,012)	-	(7,572)	-	(8,584)
Veritext	Court Reporter	-	-	-	(8,456)	-	-	-	-	-	(8,456)
Angela Zawadzki	Translator/Interpreter	(8,184)	-	-	-	-	-	-	-	-	(8,184)
Booth Media Group Inc	Media/PR	-	-	-	-	(6,040)	(2,024)	-	-	-	(8,064)
Appeal Tech	Professional Services - Legal	-	-	-	-	-	-	-	-	(7,973)	(7,973)
Paul Orzulak	Media/PR	(7,500)	-	-	-	-	-	-	-	-	(7,500)
Patricio Salazar Cordova	LAP Ecuadorian Counsel	-	-	-	-	-	-	-	-	(6,477)	(6,477)
Pachamama Alliance	NGO	-	-	-	-	(100)	(1,000)	(3,484)	(1,500)	-	(6,084)
Simon Billeness	Media/PR/Pressure	-	-	-	-	-	(250)	-	-	(5,000)	(5,250)
CD Language Solutions	Translations	-	-	(5,200)	-	-	-	-	-	-	(5,200)
Independent Media	Media/PR	-	-	-	-	-	-	-	-	(5,000)	(5,000)
John Boyd	1782 Counsel for Kamp and E-Tech	(5,000)	-	-	-	-	-	-	-	-	(5,000)
Kevin Koenig	NGO (Amazon Watch) and Media/PR	-	-	-	-	-	(1,500)	-	(3,000)	-	(4,500)
Suzanne Parish	Other Services	-	-	-	-	-	-	-	(4,000)	-	(4,000)
Union De Afectados Por Texaco	LAP Allied Organization	-	-	-	-	-	(4,000)	-	-	-	(4,000)
Diane Noboa	Media/PR	-	-	-	-	-	-	(3,000)	-	-	(3,000)
Katie Sullivan	Financial Administration and Funding	-	-	-	-	-	-	-	-	(2,580)	(2,580)
Jason Glaser	Investigations	-	-	(2,018)	-	-	-	-	-	-	(2,018)
Ann Corbett	Media/PR (Wife of Simon Billeness)	-	-	-	-	-	-	-	(2,000)	-	(2,000)
Eissran Business Alliance	Other Services	-	(1,861)	-	-	-	-	-	-	-	(1,861)
Transperfect	Translations	-	(1,010)	(511)	-	(260)	-	-	-	-	(1,781)
Uyunkar Domingo Peas Nampichkai	Ecuadorian Activist	-	-	-	-	-	-	-	-	(1,365)	(1,365)
Asteri Soutions LLC	Investigations (Jason Glaser)	-	-	(1,039)	-	-	-	-	-	-	(1,039)
Square Space	Media/PR	-	-	-	-	-	-	-	(216)	(822)	(1,038)
Subtotal: Ecuador Litigation Expenditures		\$ (1,747,386)	\$ (280,966)	\$ (124,321)	\$ (95,506)	\$ (88,636)	\$ (22,636)	\$ (65,091)	\$ (81,698)	\$ (127,760)	\$ (2,634,000)

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Time Period: January 2010 through December 2018

Payee	Role/Relationship [1]	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Canada Litigation Expenditures											
Peter Grant Law Corp.	LAP Legal Team	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (106,582)	\$ (106,582)
Anton Tabuns	Professional Services - Legal	-	-	-	(17,000)	-	-	-	-	(34,365)	(51,365)
University of Calgary	Media/PR	-	-	-	-	-	-	-	-	(41,152)	(41,152)
Rex Weyler	Media/PR	-	-	-	-	-	-	-	(4,905)	(13,848)	(18,753)
First Nations Summit Society	Indigenous Representative	-	-	-	-	-	-	-	-	(3,775)	(3,775)
Waddell Phillips, PC	Professional Services - Legal	-	-	-	-	-	-	-	-	(2,220)	(2,220)
Subtotal: Canada Litigation Expenditures		\$ -	\$ -	\$ -	\$ (17,000)	\$ -	\$ -	\$ -	\$ (4,905)	\$ (201,941)	\$ (223,847)
Subtotal: Ecuador & Canada Litigation Expenditures		\$ (1,747,386)	\$ (280,966)	\$ (124,321)	\$ (112,506)	\$ (88,636)	\$ (22,636)	\$ (65,091)	\$ (86,604)	\$ (329,701)	\$ (2,857,847)
SRD Expenditures That May Be Ecuador Litigation Related [3]											
SRD Employee		\$ (122,159)	\$ (47,937)	\$ (2,775)	\$ (51,160)	\$ (3,000)	\$ -	\$ -	\$ -	\$ -	\$ (227,030)
Airline		(1,081)	(14,823)	(64,227)	(7,624)	(5,884)	(6,870)	(7,115)	(14,683)	(17,860)	(140,166)
Lodging		(1,859)	(1,973)	(6,160)	(1,411)	(3,506)	(2,653)	(4,874)	(9,943)	(6,162)	(38,541)
Dining		-	(1,262)	(3,526)	(1,338)	(1,563)	(237)	(384)	(3,416)	(4,964)	(16,689)
Travel - Other		-	-	-	-	-	-	(8)	-	(40)	(48)
Subtotal: SRD Expenditures That May Be Ecuador Litigation Related		\$ (125,100)	\$ (65,995)	\$ (76,687)	\$ (61,532)	\$ (13,953)	\$ (9,760)	\$ (12,381)	\$ (28,041)	\$ (29,025)	\$ (422,475)
TOTAL - Ecuador & Canada Litigation Expenditures and SRD Expenditures That May Be Ecuador Litigation Related		\$ (1,872,486)	\$ (346,961)	\$ (201,008)	\$ (174,038)	\$ (102,589)	\$ (32,396)	\$ (77,472)	\$ (114,645)	\$ (358,727)	\$ (3,280,322)

Notes:

[1] Firms and individuals that performed either "Media/PR" or "Investigations" services may have done so in support of the Ecuador Litigation or for Donziger personally. For the purposes of this analysis, it is assumed that such services were in support of the Ecuador Litigation.

[2] Aaron Marr Page has testified that he was paid for both work on the Ecuador Litigation and as personal counsel for Donziger; however, it is unclear which payments were related to any particular case. As such, all payments to Aaron Marr Page and Forum Nobis are split 50/50 between the Ecuador case and SRD Personal Counsel.

[3] "SRD Expenditures That May Be Ecuador Litigation Related" includes Airfare, Lodging, Dining, and Travel expenditures made in Ecuador, Canada, Argentina, Brazil, and Belgium which were ostensibly in support of the Ecuador Litigation, as well as payroll and other payments to Donziger's employees.